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Attorneys for Claimant
GABINO PEREZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

GABINO PEREZ, individually, and on
behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

vs.

HAYWARD NISSAN CORPORATION, a
California corporation; STEVENS CREEK
CHRYSLER JEEP DODGE, an unknown
business entity; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: RG21106267

Assigned for All Purposes to:
Hon. Han N. Tran Dept. 22

**NOTICE OF ENTRY OF ORDER
GRANTING PLAINTIFFS' MOTION FOR
APPROVAL OF PAGA SETTLEMENT
AND ENTERING JUDGMENT**

Complaint Filed: July 23, 2021
Trial Date: May 10, 2027

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on July 10, 2026, the Honorable Han N. Tran, in
3 Department 22 of the above-entitled Court, located at 1225 Fallon Street in Oakland, California
4 94612, executed the Order Granting Plaintiff's Motion for Approval of PAGA Settlement and
5 Entering Judgment. Attached hereto as **Exhibit A** is a true and correct copy of the Signed Order
6 granting Plaintiff's Motion for Preliminary Approval of PAGA Settlement and Entering Judgment
7 which was executed and filed on July 10, 2026. Attached hereto as **Exhibit B** is a true and correct
8 copy of the Court's July 9, 2026, minute order.
9

10 Dated: July 27, 2026

PROTECTION LAW GROUP, LLP

11
12 By:



Heather Davis, Esq.
Peter Horton, Esq.
Shadi Sahebghalam, Esq.
Kiryl Karpiuk, Esq.
Attorneys for Plaintiff

Exhibit A

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Attorneys for Plaintiff
GABINO PEREZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

GABINO PEREZ, individually and on behalf
of other aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

HAYWARD NISSAN CORPORATION, a
California corporation; STEVENS CREEK
CHRYSLER JEEP DODGE, an unknown
business entity; and DOES 1 through 50,
inclusive,

Defendants.

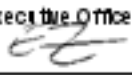
Case No. RG21106267

Honorable Han Tran
Department 22

**[PROPOSED] ORDER APPROVING
PAGA SETTLEMENT AND ENTERING
JUDGMENT**

Date: July 15, 2026
Time: 2:30 p.m.
Department: 8

Complaint Filed: July 23, 2021
Trial date: None Set

FILED
Superior Court of California
County of Alameda
07/10/2026
Clad Flike, Executive Officer / Clerk of the Court
By:  Deputy
E. Zhong

1 Having reviewed and considered Plaintiff GABINO PEREZ's ("Plaintiff") Motion for
2 Approval of PAGA Settlement, and good cause appearing for the same, it is hereby **ORDERED,**
3 **ADJUDGED, and DECREED:**

4 1. The Court hereby approves the Joint Stipulation of PAGA Settlement and Release
5 attached as Exhibit 2 to the Declaration of Heather Davis ("Settlement Agreement" or
6 "Settlement") as a fair, reasonable, and adequate resolution of the PAGA claims alleged in the
7 Action.

8 2. The Settlement Agreement is hereby deemed incorporated herein as if expressly set
9 forth. Final judgment is hereby entered in conformity with the Settlement. All terms used herein
10 shall have the same meaning as defined in the Settlement Agreement except as otherwise set forth
11 in this order.

12 3. This Court has jurisdiction over the subject matter of this Action, and over all Parties
13 to this Action, including Plaintiff, the State of California, and all "PAGA Members."

14 4. The Court designates Phoenix Class Action Administration Solutions ("Phoenix") as
15 the third-party Settlement Administrator for mailing the PAGA Members' Notices of PAGA
16 Settlement, calculating the payments to the PAGA Members, distributing the settlement payments
17 approved by the Court from the Gross Settlement Amount, and other duties set forth in the
18 Settlement. Pursuant to the terms of the Settlement, Defendant shall deposit with the Settlement
19 Administrator the Gross Settlement Amount of One Hundred and Fifty Thousand Dollars
20 (\$150,000.00) within 14 days of the Effective Date and shall provide to the Settlement
21 Administrator a list of the PAGA Members that identifies for each PAGA Member their full name,
22 last known home address, social security number, total number of pay periods worked by each
23 PAGA member during the PAGA Period ("PAGA Member List").

24 5. Within fourteen (14) days after receipt of the list of PAGA Members from Defendant
25 the Settlement Administrator shall distribute the Gross Settlement Amount of One Hundred and
26 Fifty Thousand Dollars (\$150,000.00) as provided in the Settlement Agreement and set forth
27 below:
28

- 1 a. Fifty Thousand Dollars (\$50,000.00) to Protection Law Group, LLP and Lawyers for
2 Justice P.C. (“Plaintiff’s Counsel”) for attorneys’ fees and attorneys’ costs in the
3 amount of Seventeen Thousand and Thirty-Nine Dollars and Fifty-Two Cents
4 (\$17,039.52), from the Gross Settlement Amount as final payment for and complete
5 satisfaction of any and all attorneys’ fees and costs incurred by and/or owed to
6 Plaintiff’s Counsel related to the Action.
- 7 b. Seven Thousand Five Hundred Dollars (\$7,500.00) to Plaintiff Gabino Perez from
8 the Gross Settlement Amount, to compensate him for his services in prosecuting the
9 Action and performing work in support of the Action;
- 10 c. Two Thousand Five Hundred Dollars (\$2,500.00) to the Settlement Administrator,
11 Phoenix Class Action Administration Solutions, from the Gross Settlement Amount
12 for administration expenses incurred by the Settlement Administrator; and
- 13 d. After deducting Plaintiff’s Counsel Award, Plaintiff’s Incentive Payment, and the
14 Settlement Administration Costs, the remaining Net Settlement Amount shall be
15 distributed to the California Labor and Workforce Development Agency (“LWDA”)
16 and the PAGA Members. 75% of the Net Settlement Amount shall be distributed to
17 the LWDA. 25% of the Net Settlement Amount shall be distributed to the PAGA
18 Members on a pro rata basis based on the number of Pay Periods worked by each
19 PAGA Member during the PAGA Period. The Settlement Administrator shall mail
20 each PAGA Member their Individual Settlement Payment check along with the
21 Notice of PAGA Settlement attached to the Settlement Agreement as Exhibit A.

22 7. All checks to the PAGA Members shall remain valid and negotiable for 180 days
23 from their date of issuance. If any checks are not cashed within 180 days of mailing, those funds
24 shall be transmitted to the Controller of the State of California to be held pursuant to the Unclaimed
25 Property Law, California Code of Civil Procedure § 1500, *et seq.* in the names of those PAGA
26 Members who did not cash their checks until such time they claim their property.

27 8. Upon the funding of the Gross Settlement Amount, Plaintiff, all other PAGA
28

1 Members, the state of California, and the LWDA shall be deemed to have released their respective
2 Released Claims against the Released Parties. The release of the “Released Claims” is explicitly
3 limited to those claims that arose between May 18, 2021, and November 12, 2025. Further this
4 release does not release any individual’s non-PAGA claims, except for Plaintiff as detailed below.

5 9. In addition, to the release of the Released Claims, upon the funding of the Gross
6 Settlement Amount Plaintiff shall also be deemed to have released Plaintiff’s Additional Released
7 Claims against the Released Parties.

8 7. The Court finds that Plaintiff gave notice to the California Labor Workforce and
9 Development Agency (“LWDA”) and to Defendant of his intention to pursue claims for civil
10 penalties under PAGA arising out of the facts and legal theories alleged in the Complaint, that the
11 LWDA did not give notice that it intended to investigate these claims within 65 days of receiving
12 Plaintiff’s notice, and that Plaintiff is therefore authorized to pursue these claims on behalf of the
13 LWDA. The Court further finds that Plaintiff gave notice of this proposed settlement of those claims
14 under PAGA to the LWDA in accordance with Labor Code section 2699(1)(2), and that the LWDA
15 has not expressed any objection to the proposed settlement. Accordingly, this Judgment also bars
16 the LWDA, or any other agency of the State of California, or any person acting on its behalf, from
17 collecting any penalties due to any of them, or any unpaid wages due to PAGA Members, to the
18 extent those penalties or unpaid wages arise out of the Released Claims or the facts giving rise to
19 those claims. *Arias v. Super. Ct.*, 46 Cal.4th 969, 985-86 (2009).

20 8. Plaintiff’s Counsel are directed to submit a copy of this Order and Judgment to the
21 California Labor and Workforce Development Agency within 10 days of entry of the Judgment.

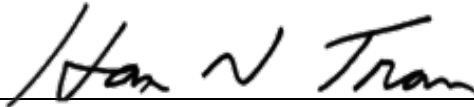
22 9. The Court sets a compliance hearing date regarding the distribution of the settlement
23 funds for 2/9/27, at 3:00pm ~~a.m.~~ ^{p.m.} Plaintiff’s Counsel is directed to file a
24 compliance statement with the Court one week prior to the hearing.

25 10. Without affecting the finality of this Order and Judgment, the Court shall retain
26 continuing jurisdiction over this Action and the Parties, and over all matters pertaining to the
27 implementation and enforcement of the terms of the Settlement Agreement pursuant to the Civil
28

1 Procedure section 664.6. Except as provided to the contrary herein, any disputes or controversies
2 arising with or with respect to the interpretation, enforcement, or implementation of the Settlement
3 Agreement shall be presented to the Court for resolution.

4 **IT IS SO ORDERED, ADJUDGED, AND DECREED.**

5 DATED: 07/10/2026
6



JUDGE OF THE SUPERIOR COURT
Han N. Tran / Judge

Exhibit B

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA

Rene C. Davidson Courthouse

Gabino Perez

Plaintiff/Petitioner(s)

VS.

Hayward Nissan Corproation,
a California corporation et al

Defendant/Respondent

(s)

No. RG21106267

Date: 07/10/2026

Time: 4:23 PM

Dept: 22

Judge: Han N. Tran

ORDER re: Compliance Hearing re:
PAGA Settlement

The Court orders the following after review of the case.

Compliance Hearing re: PAGA Settlement is scheduled for 02/09/2027 at 3:00 PM in
Department 22 at Rene C. Davidson Courthouse.

In light of the Court's grant on 7/10/26 of plaintiff's motion for approval of PAGA settlement, the
Court sets a compliance hearing on the date set forth above.

Plaintiff is **ORDERED** to file a compliance statement/report, with a courtesy copy emailed to
the department clerk, **no later than 2/2/27**.

Clerk is directed to serve copies of this order, with proof of service, to counsel and to self-
represented parties of record.

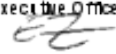
Dated : 07/10/2026



Han N. Tran / Judge

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA

Rene C. Davidson Courthouse

SUPERIOR COURT OF CALIFORNIA COUNTY OF ALAMEDA	Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: Rene C. Davidson Courthouse 1225 Fallon Street, Oakland, CA 94612	FILED Superior Court of California County of Alameda 07/13/2026
PLAINTIFF/PETITIONER: Gabino Perez	Chad Finke, Executive Officer / Clerk of the Court By:  Deputy
DEFENDANT/RESPONDENT: Hayward Nissan Corporation, a California corporation et al	E. Zhong
CERTIFICATE OF ELECTRONIC SERVICE CODE OF CIVIL PROCEDURE 1010.6	CASE NUMBER: RG21106267

I, the below named Executive Officer/Clerk of Court of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served one copy of the General Order (re: Compliance Hearing re: PAGA Settlement) entered herein upon each party or counsel of record in the above entitled action, by electronically serving the document(s) from my place of business, in accordance with standard court practices.

Ali Reza Mirhosseini
MIRHOSSEINI LAW GROUP
ALI@ARMLAW.NET

Edwin Alwazian
Lawyers for Justice, PC
ss@calljustice.com

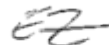
Heather Marie Davis
Protection Law Group, LLP
heather@protectionlawgroup.com

KIRYL KARPIUK
PROTECTION LAW GROUP, LLP
kiryl@protectionlawgroup.com

Dated: 07/13/2026

Chad Finke, Executive Officer / Clerk of the Court

By:



E. Zhong, Deputy Clerk